

MEMORANDUM

SUBJECT: 1996 Revision to the 1981 PCB Compliance Monitoring Program (CMP) for 10 Interstate Natural Gas Transmission Pipelines

FROM: Michael Calhoun, Environmental Scientist
Multimedia Enforcement Branch

THRU: David Hindin, Chief
Multimedia Enforcement Branch

TO: Melissa Marshall, Director
Multimedia Enforcement Division

The purpose of this memorandum is to seek your approval of 9 revised PCB Compliance Monitoring Plans based on the Interstate Natural Gas Association of America (INGAA) protocol approved by MED on July 3, 1996. If you agree, please sign the nine approval letters attached to this memorandum.

Background

1996 PCB Compliance Monitoring Program (CMP) for Ten Interstate Natural Gas Pipelines

On July 3, 1996, ORE/MED approved a proposal by the Interstate Natural Gas Association of America (INGAA) to revise the 1981 PCB Compliance Monitoring Program for the 10 remaining natural gas pipeline companies. Under the revised program, each of the ten pipeline companies are to submit a revised PCB monitoring plan to include new system maps, a summary and analysis of historical PCB data and a new PCB sampling protocol. ORE/MED requested all monitoring plans to be submitted no later than September 30, 1996. ORE/MED expects to approve the ten the revised monitoring plans no later than November 30, 1996

(5 plans in October and 5 plans in November). In January 1981, PCBs were discovered in natural gas pipeline liquids in Long Island, NY. Pipeline liquids include pipeline condensate and other liquids that were intentionally or accidentally added to the pipeline. Pipeline condensates, primarily composed of hydrocarbon distillates, occur as a result of the movement of pressurized natural gas through a pipeline under varying temperature conditions. Examples of liquids added to natural gas pipelines include methanol as a solvent, metals formulations for

corrosion protection and PCBs from turbine compressor seal leaks or from waste oil.

EPA, state and industry formed a taskforce in January 1981 to address the PCB problem and to coordinate national activities. Under this taskforce, headquarters EPA took responsibility for major interstate transmission companies, while the EPA Regions were asked to work with public service commissions and local distribution companies. Extensive EPA and industry sampling of pipeline transmission liquids revealed that 13 major natural gas transmission companies had PCB contamination greater than 50 ppm in violation of the PCB Rule Prohibitions Section found at 40 CFR Section 761.20. PCB pipeline liquids contamination also was found at a number of local distribution companies.

Background (continued)

In late 1981, EPA instituted a Compliance Monitoring Program (CMP) for these 13 companies found to have **PCBs greater than 50 ppm**. At that time, the use of PCBs at greater than 50 ppm constituted a use of PCBs in a non-totally enclosed manner, which was prohibited by 40 CFR Section 761.20(a). Individual monitoring plans were finalized with each company. In general, the CMP required each company to develop remedial plans with four basic objectives: (1) to ensure the proper storage and disposal of PCBs; (2) to contain PCB contamination to limited areas of the transmission system; (3) to eliminate any further entry of PCBs into the pipeline system; and (4) to remove remaining PCB contamination from the pipeline system. (See TAB 2).

EPA decided that it would not take enforcement action against such companies for the **improper use of PCBs** as long as they participated in an EPA compliance monitoring program. **All companies were required to comply with all other aspects of the PCB rule, which included marking, recordkeeping and disposal.** (See TAB 3.)

In 1983, three companies were dropped from the CMP because their PCB levels were found to be less than 50 ppm PCBs. The three companies dropped in 1983 were Great Lakes, Michigan-Wisconsin and Northern Natural. In July 1984, EPA amended the PCB regulations and authorized the use of PCBs in natural gas pipelines at less than 50 ppm pursuant to 40 CFR Section 761.30(i).

To date, **10 companies are still participating in the CMP and have submitted semi-annual reports to Headquarters since 1983.** The ten companies are Algonquin Gas; Columbia Gas; Columbia Gulf; CNG/Consolidated Gas; Midcon; Tennessee Gas; Texas Gas, Transco; Panhandle (Texas)Eastern; Enron (Transwestern). (See TAB 4 for example CMP monitoring report.) In general, these companies have conducted biannual sampling activities at selective points on their systems. Example sampling locations include key points where gas is sold or purchased, major liquid collection points along a system and gas stream sampling at major sales points. EPA Headquarters has periodically sent copies of CMP reports to the regional offices for their use in targeting PCB inspections.

1995-EPA and Natural Gas Pipeline Companies Meeting

On November 1, 1995, Mike Calhoun of ORE/MED and Tony Baney and John Smith of OPPTS/OPPT met with officials from 10 major natural gas pipeline transmission companies, American Gas Association (AGA) and the Interstate Natural Gas Association of America (INGAA). The meeting had two main purposes. First, EPA/MED requested the 10 pipeline companies still participating in the CMP to revise their existing plans.

Second, EPA/OPPT explained in general terms how the proposed PCB "Mega" Rule and the expanded PCB use authorization for natural gas pipelines contained in the "Mega" Rule will replace the historical 1981 CMP, as well as, streamline permitting, decontamination and disposal issues relating to natural gas pipelines. During the meeting, EPA representatives answered industry questions on both the 1981 CMP and the proposed PCB rule. (See TAB 5.)

MED Lead on the 1981 CMP

In a memorandum dated April 3, 1996, ORE/TPED and ORE/MED agreed that MED would take the lead in monitoring the 1981 CMP and multimedia pipeline enforcement cases. (See TAB 6.) MED receives CMP semi-annual reports for the ten participating companies in April/May and in October/November. All reports are reviewed by Mike Calhoun (about 20-30 minutes per report). As stated previously, these reports are sent to the Regional TSCA program offices generally at the end of the calendar year.

INGAA's 1996 Proposal

Attached as Tab 7 is INGAA's proposal to revise the 1981 CMP. Note that since 1989 we estimate that 2.25 million gallons of PCB liquids have been disposed of in accordance with TSCA and the PCB regulations under the CMP.

INGAA's April 8, 1996 proposal requires **each natural gas pipeline company to annually generate and submit:**

- (1) a system map, to include both main and lateral lines, delineating the areas with PCB contamination greater than or equal to 50 ppm PCBs over at least the last 3 years; (**This would be very useful because EPA does not have any updated big picture maps showing the location of PCB contamination across a pipeline system.**)
- (2) a summary and analysis of the historical PCB monitoring data; (**Getting the companies to do this saves much time and allows MED to review and verify their analysis quickly.**)

INGAA's 1996 Proposal (cont.)

- (3) a representative PCB sampling protocol; (**The 1981 sampling protocols and sampling points are terribly out-of-date. After 15 years of sampling, the CMP companies know**

where the PCB contamination problems are. Under the INGAA proposal, each CMP companies will submit a revised annual liquids sampling protocol that has been specifically developed to monitor a **known area or segment of PCB contamination** on the system. While the sampling is reduced from a biannual frequency to an annual frequency, EPA gets *quality* samples at the areas known to be PCB contaminated. MED will be able to review and comment on each 1996 sampling protocol and ensure it is representative.) and

- (4) a summary of pipeline liquids removed from the system. (This provision was included in the 1981 CMP and is only slightly revised in the 1996 updated proposal. The most important benefit is that amount of liquids removed from a given area can be easily linked to the new system map. With this change to the CMP, EPA and States can focus on those areas of a pipeline system that are generating large volumes of PCB condensate. This will also encourage the member CMP companies to take pollution prevention steps to reduce the generation of large volumes of PCB condensate.

The advantages of accepting INGAA's proposal are listed below.

- o The 1996 INGAA proposal allows EPA and industry to make the transition from the CMP to similar requirements in the upcoming PCB disposal regulation amendments. Upon promulgation (probably in 1997), the new PCB rules will supersede the CMP that has been based on EPA's use of enforcement discretion. The new regulations will authorize the use of PCBs at greater than 50 ppm subject to certain conditions, including a reporting requirement to the Regions or OPPT (**but not ORE/MED**).
- o EPA obtains updated pipeline system maps and summaries showing where PCB contamination exists. MED will provide this information to Regions and States for their use in monitoring interstate and local distribution pipeline companies.
- o INGAA proposal conserves EPA's limited resources.
- o CMP companies also conserve their resources in simplifying PCB sampling and reporting requirements.

After 15 years of monitoring, the CMP should be revised and streamlined. This proposal takes into account the pending final PCB disposal amendments that upon promulgation will terminate the CMP and EPA's longest running enforcement discretion program. EPA, INGAA and 10 INGAA member companies have reached consensus on a CMP revision that benefits all the parties involved.

If you approve of this activity, we estimate that the 10 revised CMP monitoring plans will be submitted between July and September of this year. MED time needed to review each plan is estimated at approximately 2 days per plan.

Attachments

Jerald V. Halvorsen, President
Interstate Natural Gas Association of America

555 13th Street, NW
#300 West
Washington, DC 20004

Dear Mr. Halvorsen:

The purpose of this letter is to formally notify you of EPA's acceptance of the Interstate Natural Gas Association of America's (INGAA) proposal to revise the 1981 Compliance Monitoring Program (CMP) as described in INGAA's April 8, 1996 letter to Michael Calhoun of my staff. (See enclosure.)

In order to implement the revised CMP, EPA requests that each of the ten member CMP companies acknowledge to EPA in writing its acceptance of this proposal within 30 days of receipt of this letter. In addition, I request that each company submit its revised monitoring plan (PCB system map, summary, analysis and sampling protocol) to me no later than September 30, 1996. In approving the revised CMP, all companies are still required to comply with all other aspects of the PCB regulations, including but not limited to, marking, recordkeeping and disposal. Each company must continue to implement its 1981 CMP until EPA approves of its revised monitoring plan.

In closing, I would like to thank INGAA, Mr. Kinne, and your members for assisting EPA in updating and streamlining the CMP. If you or your members have any questions on the revised CMP or other matters, please call Michael Calhoun at 202-564-6031.

Sincerely,

Melissa Marshall, Director
Multimedia Enforcement Division

Enclosure

cc: J. Baskerville
TSCA Regional Division Directors
T. Kinne
1996 CMP Companies